



Littler Mendelson, P.C.
One International Place
Suite 2700
Boston, MA 02110

August 13, 2015

Michael Mankes
617.378.6006 direct
617.378.6000 main
617.737.0052 fax
mmankes@littler.com

VIA CM/ECF

The Honorable Nathaniel M. Gorton
United States District Court
for the District of Massachusetts
One Courthouse Way
Boston, MA 02210

Re: *Maisha Emmanuel, et al. v. Handy Technologies, Inc.*
C.A. No. 1:15-cv-12914-NMG

Dear Judge Gorton:

We write regarding the above-referenced case, to which you have been assigned.

As you may be aware, Plaintiff Maisha Emmanuel brings this lawsuit as a putative collective action pursuant to the Fair Labor Standards Act and class action pursuant to Rule 23 of the Federal Rules of Civil Procedure.

On August 10, Defendant Handy Technologies, Inc. ("Handy") filed a motion to compel individual arbitration pursuant to the Federal Arbitration Act in accordance with a mandatory arbitration agreement entered into between the parties. On the same day, Plaintiff filed a motion for conditional certification of a class under the FLSA.

For the reasons described in the emergency motion for a stay, filed herewith, Handy submits that it would clearly be in the best interest of the parties, not to mention judicial economy, to stay any proceeding relating to the motion for conditional class certification pending a ruling on Handy's motion to compel arbitration.

In order for the parties to discuss with Your Honor the most efficient way to proceed in light of the above, Defendant respectfully requests that the Court schedule an expedited status conference to address appropriate briefing and hearing of the pending motions.

The Honorable Nathaniel M. Gorton
August 13, 2015
Page 2

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Michael Mankes
Michael Mankes

/s/ Roberta A. Kaplan
Roberta A. Kaplan

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of August, 2015, a true and accurate copy of this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing, and via first class mail to unregistered participants.

/s/ Michael Mankes
Michael Mankes

135304057.1 082196.1021